TRINA A. HIGGINS, United States Attorney (#7349)
CARL D. LESUEUR, Assistant United States Attorney (#16087)
Attorneys for the United States of America
Office of the United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176

Telephone: (801) 524-5682 Email: carl.lesueur@usdoj.gov

## IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

VS.

FELONY CRIMINAL COMPLAINT

JUSTIN DEE ADAMS,

Vio: 18 U.S.C. § 111(a)

Defendant.

Judge Jared C. Bennett

Before the Honorable Jared C. Bennett, United States Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

## COUNT I 18 U.S.C. § 111(a) (Assault of Federal Officer)

On or about October 19, 2022, in the District of Utah,

## JUSTIN DEE ADAMS,

the defendant herein, did forcibly assault, resist, oppose, impede, intimidate, and interfere with a task force officer employed by the U.S. Federal Bureau of Investigation, a designated person under Section 1114 of Title 18, United States Code, while the task force officer was engaged in and on account of the task force officer's performance of official duties (specifically, the execution of a search warrant and arrest warrant) and such acts did involve physical contact with the victim of that assault; all in violation of Section 111, Title 18 of the United States Code.

This complaint is made on the basis of investigation consisting of the following:

- 1. I am a Task Force Officer assigned to the Federal Bureau of Investigation (FBI) Salt Lake City Division. I have been a law enforcement officer since September 2013. I am also a member of the Joint Terrorism Task Force (JTTF) assigned specifically for the past six years to investigating acts of domestic terrorism. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States.
- 2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, and agencies. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant. It does not set forth all of my knowledge, or the knowledge of others, about this matter.

- 3. Based on my training and experience and the facts as set forth in this affidavit, I respectfully submit that there is probable cause to believe that a violation of 18 U.S.C. § 111(a)(1) (assaulting a federal agent) has been committed by Justin Dee ADAMS ("ADAMS").
- 4. On October 7, 2022, ADAMS was charged in Case No. 1:22-mj-00219 in the United States District Court for the District of Columbia by criminal complaint with a violation of Section 111, Title 18, U.S. Code and other criminal violations in connection with the riot at the United States Capitol on January 6, 2021, where, among other things, ADAMS allegedly removed a bike rack being used as a barricade by police, physically charged toward the police line, physically attacking one or more police officers. The United States District Court for the District of Columbia issued a warrant for ADAMS' arrest in connection with the criminal complaint.
- 5. On October 19, 2022, I went with several other officers to ADAMS' residence in West Jordan, Utah to execute the arrest warrant, as well as a search warrant issued by this Court on October 7, 2022, in case no. 1:22-mj-219. We approached the door and knocked on the door. ADAMS answered the door. I notified him we were with the FBI and there was an arrest warrant for him in connection with the events of January 6, 2021. He responded that he was not going to come with us and retreated into his residence, attempting to shut the door. I grabbed the door, and another task force officer entered the residence. The task force officer grabbed ADAMS' arm. ADAMS swung his arm and struck the task force officer in the face with ADAMS' elbow in an attempt to

get away. This caused the task force officer to lose his grasp on ADAMS. He attempted to regain control of ADAMS, who continued to physically resist and avoid restraint, retreating farther into the home, toward his bedroom. During this struggle, ADAMS caused injury to the task force officer's thumbnail, which began to bleed. ADAMS continued to retreat toward the bedroom. He turned around momentarily and agents asked where he was going. He stated he was going to get his shoes. But, agents later determined, his shoes were actually in the area where the agents were standing. Additional agents came into the house. ADAMS took a couple steps toward the agents, but refused to comply with verbal commands. Four agents attempted to restrain ADAMS and place him in handcuffs. During this process, the agents gave him verbal instructions to surrender his hands and arms to be placed in handcuffs, and he refused. Law enforcement subsequently recovered firearms from the bedroom.

6. While in law enforcement's vehicle at the U.S. Marshalls office receiving area, he continued to threaten the officer, stating, "Hey midget get these cuffs off, and I will kick you're a\*\*." In the receiving center outside the U.S. Marshall's office, ADAMS continued to refuse to follow instructions, including refusing to exit the vehicle.

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Based on the foregoing information, your affiant respectfully requests that a warrant of arrest be issued for JUSTIN DEE ADAMS for a violation of Section 111(a) of Title 18, United States Code.

Affiant.

Task Force Officer Jennifer L. Faumuina, Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 19th day of October, 2022.

Jared C. Bennett

United States MagistrateJudge

APPROVED:

TRINA A. HIGGINS United States Attorney

CARL D. LESUEUR

Assistant United States Attorney